

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ACKERMAN MCQUEEN, INC.	§	
	§	
v.	§	Case No. 3:19-cv-03016-X
	§	
GRANT STINCHFIELD	§	

**PLAINTIFF'S MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff, Ackerman McQueen, Inc. ("*AMc*"), files this *Motion for Protective Order* (the "*Motion*") and asks the Court, pursuant to Federal Rule of Civil Procedure 26(c), to enter the proposed Protective Order ("*Protective Order*") submitted concurrently herewith to protect the confidential information and documents of the parties. Accompanying this Motion is a Brief and supporting exhibits setting forth the grounds for entering the Protective Order under the unique facts of this case.

WHEREFORE, for good cause shown in the submissions filed with the Court, AMc asks the Court to enter the Protective Order and grant AMc such other and further relief to which it may be justly entitled.

Dated: June 26, 2020.

Respectfully submitted,

/s/ Brian Vanderwoude

**Jay J. Madrid, Esq.**

Texas Bar No. 12802000

[madrid.jay@dorsey.com](mailto:madrid.jay@dorsey.com)

**G. Michael Gruber, Esq.**

Texas Bar No. 08555400

[gruber.mike@dorsey.com](mailto:gruber.mike@dorsey.com)

**J. Brian Vanderwoude, Esq.**

Texas Bar No. 24047558

[vanderwoude.brian@dorsey.com](mailto:vanderwoude.brian@dorsey.com)

**Brian E. Mason, Esq.**

Texas Bar No. 24079906

[mason.brian@dorsey.com](mailto:mason.brian@dorsey.com)

**DORSEY & WHITNEY LLP**

300 Crescent Court, Suite 400

Dallas, Texas 75201

(214) 981-9900 Phone

(214) 981-9901 Facsimile

**ATTORNEYS FOR PLAINTIFF**

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with Ian Shaw, counsel for Defendant, regarding the proposed Protective Order and the matters raised in this motion. I sent Mr. Shaw a draft of the proposed Protective Order. In response, Mr. Shaw stated, "We object to the protective order, but we will provide protection to information regarding trade secrets." Earlier this week, Mr. Shaw reiterated that "we object to the proposed protective order and we will most likely move against the protective order." Thus, this matter is being submitted to the Court for determination.

/s/ Brian Vanderwoude

J. Brian Vanderwoude

### CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2020, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Brian Vanderwoude

J. Brian Vanderwoude